IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL No. 2187
IN RE: AMERICAN MEDICAL SYSTEMS, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL No. 2325
IN RE: BOSTON SCIENTIFIC, PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL No. 2326
IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL No. 2327
IN RE: COLOPLAST PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL No. 2387
IN RE: COOK MEDICAL, INC, PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL No. 2440
IN RE NEOMEDIC PELVIC REPAIR SYSTEM PRODUCT LIABILITY LITIGATION	MDL No. 2511
THIS DOCUMENT RELATES TO ALL CASES	

MOTION TO EXCEED PAGE LIMIT FOR COMMON BENEFIT FEE AND COST COMMITTEE'S PETITION FOR AN AWARD OF COMMON BENEFIT ATTORNEYS' FEES AND EXPENSES AND MEMORANDUM IN SUPPORT

The undersigned members of the Common Benefit Fee and Cost Committee ("FCC"), move the Court pursuant to Local Rule 7.1(a)(2) for leave to exceed the page limit specified under said Rule for their Petition for an Award of Common Benefit Attorneys' Fees and Expenses and Memorandum in Support, and show as follows:

The FCC acknowledges the admonition of the Court's Local Rule 7.1(a)(2) that motions to exceed page limitations are disfavored and will be denied without a showing of good cause. Plaintiffs respectfully submit that good cause exists here in light of the import of the scope and import of the issues for all related MDLs. The FCC's Petition for an Award of Common Benefit Attorneys' Fees and Expenses and Memorandum in Support sets forth the factual and legal basis for compensation for the common benefit work performed from the outset of this litigation.

Based on the foregoing, and for good cause shown, the FCC respectfully moves the Court for leave to exceed the Court's page limitation to file its Petition for an Award of Common Benefit Attorneys' Fees and Expenses and Memorandum in Support not to exceed forty (40) pages.

Dated: November 12, 2018

Respectfully submitted.

THE COMMON BENEFIT FEE AND COST COMMITTEE

By:

/s/ Henry G. Garrard, III Henry G. Garrard, III hgarrard@bbga.com Chairman of the Fee & Compensation Committee

BLASINGAME, BURCH, GARRARD & ASHLEY P.O. Box 832 Athens, GA 30603 706-354-4000

/s/ Renee Baggett

Renee Baggett

RBaggett@awkolaw.com

AYLSTOCK, WITKIN, KREIS & OVERHOLTZ 17 East Main Street, Suite 200 Pensacola, FL 32502 850-202-1010

> /s/ Riley L. Burnett, Jr. Riley L. Burnett, Jr. rburnett@rburnettlaw.com

BURNETT LAW FIRM

55 Waugh Drive, Suite 803 Houston, TX 77007 832-413-4410

/s/ Thomas P. Cartmell
Thomas P. Cartmell

tcartmell@wcllp.com

WAGSTAFF & CARTMELL, LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112 816-701-1100

/s/ Clayton A. Clark

Clayton A. Clark

CClark@triallawfirm.com

CLARK, LOVE & HUTSON, G.P. 440 Louisiana Street, Suite 1600 Houston, TX 77002 713-757-1400

/s/ Yvonne M. Flaherty

Yvonne M. Flaherty ymflaherty@locklaw.com

LOCKRIDGE GRINDAL NAUEN P.L.L.P. 100 Washington Avenue S., Suite 2200 Minneapolis MN 55401 612-339-6900

/s/ Carl N. Frankovitch

Carl N. Frankovitch carl@facslaw.com

Frankovitch, Anetakis, Colantonio & Simon 337 Penco Road Weirton, WV 26062 304-723-4400

/s/ Joseph F. Rice

Joseph F. Rice

jrice@motleyrice.com

MOTLEY RICE LLC 28 Bridgeside Blvd. Mt. Pleasant, SC 29464 843-216-9000

/s/ William H. McKee, Jr

William H. McKee, Jr bmckee@suddenlink.net

1804 Louden Heights Road Charleston, WV 25314 304-546-2347

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2018, I electronically filed the *Motion to Exceed*Page Limit for Common Benefit Fee and Cost Committee's Petition for an Award of Common

Benefit Attorneys' Fees and Expenses and Memorandum in Support with the Clerk of the

Court using the CM/ECF system which will send notification of such filing to the CM/ECF

participants registered to receive service in this MDL.

By: /s/ Henry G. Garrard, III
Henry G. Garrard, III
hgarrard@bbga.com
Chairman of the Fee &
Compensation Committee

BLASINGAME, BURCH, GARRARD & ASHLEY P.O. Box 832 Athens, GA 30603 706-354-4000